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December 11, 2017

Via Email Only

Neil S. Torczyner, Esq.
Harfenist Kraut & Perlstein LLP
3000 Marcus Avenue
2nd Floor, East Wing
Lake Success, NY 11042

Re: Cinthia Thevenin v. City of Troy, et al.
File No.: 11166-0001

Dear Mr. Torczyner:

In compliance with the Court's Text Order dated November 28, 2017, enclosed please find a Privilege Log with respect to the draft reports that had been prepared by Sgt. French.

Upon information and belief, the following individuals may have been present at the peer counseling meeting that took place following the incident at issue: Sgt. Daniel Magneto; Officer Carrie Hoover; Dispatcher Erin Bornt; Officer Robert Gaudette; Officer Christopher Parker; Officer Brandon Galligan; Officer David Dean; and Sgt. Randall French.

Given the nature and purpose of peer counseling meetings, it is our understanding that officers that took part in the meeting did so with the expectation that their communication would be kept confidential.

Very truly yours,

A handwritten signature in black ink, appearing to read "Nelluvely".

Asish A. Nelluvely

AAN/aan

cc: Michael A. Rose, Esq. (*via email only*)

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

CINTHIA THEVENIN, Individually, and as wife of
EDSON THEVENIN, Decedent, and as Administratrix
Of the Estate of EDSON THEVENIN, and as mother
and natural guardian, of Infant N.T. and as mother and
natural guardian of Infant Z.T.,

PRIVILEGE LOG

Plaintiffs,
F
- against -
Docket No.:
1:16-CV-1115(NAM/DJS)

THE CITY OF TROY, and SERGEANT RANDALL
FRENCH,

Defendants.

Doc No.	Date Range	Doc Type	Sender(s)/Recipient(s)/Copyee(s)	Description	Number of Pages	Privilege Justification
1	04/25/16	Report	R. French, A. Safranko	Response to Resistance Report	5	Attorney-Client, Attorney Work Product
2	04/25/16	Report	R. French, A. Safranko	Supplemental Report – TPD 120	1	Attorney-Client, Attorney Work Product
3	04/25/16	Report	R. French, A. Safranko	Post Pursuit Report	2	Attorney-Client, Attorney Work Product